

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SECURITIES AND EXCHANGE )  
COMMISSION, )

Plaintiff, )

vs. ) Case No. 4:22-cv-3359

MAURICIO CHAVEZ, )  
GIORGIO BENVENUTO, and )  
CRYPTOFOX, LLC, )

Defendants. )

and )

CBT GROUP, LLC, )

Relief Defendant. )

ORAL VIDEOTAPED DEPOSITION

MS. CARMEN DE LA CRUZ

December 9, 2022

Reported by:  
Michelle Hartman  
JOB No. 221209WWC

1 ORAL VIDEOTAPED DEPOSITION OF MS. CARMEN DE LA  
2 CRUZ, produced as a witness at the instance of the  
3 Plaintiff and duly sworn, was taken in the  
4 above-styled and numbered cause on the 9th day of  
5 December, 2022, from 9:12 a.m. to 1:14 p.m., before  
6 Michelle Hartman, Certified Shorthand Reporter in and  
7 for the State of Texas and Registered Professional  
8 Reporter, reported by computerized stenotype machine  
9 at the offices of Shook, Hardy & Bacon, LLP, JPMorgan  
10 Chase Tower, 600 Travis Street, Suite 3400, Houston,  
11 Texas 77002, pursuant to the Federal Rules of Civil  
12 Procedure and the provisions stated on the record or  
13 attached hereto.

1 Q. Where did you meet Mauricio Chavez?

2 A. I met him at a class about crypto and  
3 forex that was taking place in the academy.

4 Q. Were you already an investor in CryptoFX  
5 at this time?

6 A. Yes.

7 Q. And did you speak with Mauricio Chavez?

8 A. I just asked him because we had a chat  
9 about people that were receiving the classes and we  
10 needed to know the schedule and the times. I asked  
11 him about that, about the times, and told him that I  
12 was interested in learning.

13 Q. And did you attend the classes?

14 A. Yes.

15 Q. And have you learned about crypto --  
16 crypto trading?

17 A. No, I just went, but I didn't learn.

18 Q. How many classes did you attend?

19 A. I went like three times.

20 Q. And how long were the classes?

21 A. Like one hour and a half, more or less,  
22 with a crypto teacher.

23 Q. And do you know who the crypto teacher  
24 was?

25 A. Yes, Julio Taffinder, Taffinder, yes,

1 something like that, and a forex one, too, a forex  
2 teacher.

3 Q. Do you know who the forex teacher was?

4 A. Yes, Juan Puac.

5 Q. And that last name is spelled P-U-A-C?

6 A. Yes.

7 Q. But as you are sitting here today, you  
8 can't tell us what you learned?

9 A. Well, I learned is that the BitCoin is  
10 like a crypto currency that is the most famous crypto  
11 currency, and those who invest in BitCoin are  
12 investing for the future, and that the BitCoin was  
13 what they were doing with the money. I was listening  
14 to that, that they were using our money to invest in  
15 BitCoin.

16 Q. And were you involved in any of the  
17 decisions about what was done with the actual trades?

18 A. No.

19 Q. Did you learn how to make any of the  
20 trades yourself?

21 A. No, never.

22 Q. Did you learn how to make any forex  
23 trades?

24 A. No.

25 Q. So did they describe what they were doing

1 STATE OF TEXAS

2 COUNTY OF HARRIS

3  
4 REPORTER'S CERTIFICATE

5 ORAL VIDEOTAPED DEPOSITION OF

6 MS. CARMEN DE LA CRUZ

7 December 9, 2022

8  
9 I, Michelle Hartman, the undersigned  
10 Certified Shorthand Reporter in and for the State of  
11 Texas and Registered Professional Reporter, certify  
12 that the facts stated in the foregoing pages are true  
13 and correct.

14 I further certify that I am neither  
15 attorney or counsel for, related to, nor employed by  
16 any parties to the action in which this testimony is  
17 taken and, further, that I am not a relative or  
18 employee of any counsel employed by the parties  
19 hereto or financially interested in the action.  
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1 SUBSCRIBED AND SWORN TO under my hand and  
2 seal of office on this 14th day of December, 2022.

3  
4  
5 Michelle Hartman



6 Michelle Hartman, CSR, RPR

7 Texas CSR 7093

8 Expiration: 12/31/23  
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